

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

GENESIS MARINE, LLC
Plaintiff

VERSUS

SGR ENERGY, INC.
Defendant

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CIVIL ACTION NO. 4:21-cv-00289

RESPONSE TO SHOW CAUSE ORDER

NOW INTO COURT, through undersigned counsel, comes plaintiff, Genesis Marine, LLC (“Genesis”), which files this response to the Court’s February 24, 2022 SHOW CAUSE order.

Genesis shows that in fact the bankruptcy case filed by SGR Energy Inc. was dismissed by the bankruptcy court on January 21, 2022, and that the correct reading of that document is that SGR cannot file another bankruptcy proceeding until 60 days from that date, or until March 22, 2022. In other words, the bankruptcy court’s January 21, 2022, order does not state that the bankruptcy case will be dismissed sixty days from January 21, 2022, but the purpose of the order was to preclude SGR from “running” back to the bankruptcy court for at least the sixty days “with prejudice” period.

Genesis notes that the bankruptcy case was dismissed as a result of SGR’s own motion to dismiss. See Exhibit 1.

Accordingly, there is no automatic stay in place, and Genesis seeks to execute on its judgment now as it is entitled to do.

Respectfully submitted,

PHELPS DUNBAR LLP

BY: /s/ E. Martin McLeod

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CERTIFICATE OF SERVICE

I certify that on this 25th day of February, 2022, a true and correct copy of the foregoing instrument has been served upon all counsel of record via CM/ECF.

/s/ E. Martin McLeod

Of Phelps Dunbar, LLP